

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

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ASSOCIATION OF HOLOCAUST VICTIMS FOR RESTITUTION :
OF ARTWORK and MASTERPIECES, a/k/a "AHVRAM"; : 04 - CIV - 8457
MRS. ERNA DEUTSCH; DR. JORAM DEUTSCH; : (LTS)
ALICE BURGER - FISCHER; and EDWARD DAVIS FAGAN; :
Plaintiffs, :
vs. :
REPUBLIC OF HUNGARY; :
Individually and/or As Responsible For: :
HUNGARIAN NATIONAL GALLERY, :
MUSEUM DE BEAUX ARTS, :
MINISTRY OF CULTURE, and other :
HUNGARIAN STATE MUSEUMS and/or :
STATE & ART RESTORATION FACILITIES :
(the name being fictitious and used until :
the actual names is/are discovered); and :
REPUBLIC OF GERMANY; :
Individually and/or As Responsible For: :
BUNDESMINISTERIUM DER FINANZEN; BUNDESREPUBLIK: :
DEUTSCHLAND FINANZAGENTUR GmbH; HON. ROLF :
DAHLGRÜN by ESTATE OF HON. ROLF DAHLGRÜN; :
DR. FÉAUX DE LA CROIX by ESTATE OF DR. FÉAUX :
DE LA CROIX; WILHELM HÖTTL by ESTATE OF :
WILHELM HÖTTL; MR. FRITZ KOPPE by ESTATE OF :
FRITZ KOPPE; DR. DETLEV HEINRICH by :
ESTATE OF DR. DELEV HEINRICH; OLAF FREIHERR :
von KLINGSPOR by ESTATE OF :
OLAF FREIHERR von KLINGSPOR; GEORGE de :
MASIREVIC by ESTATE OF GEORGE de MASIREVIC; :
DR. ERICH FÜHRER by ESTATE OF DR. ERICH FÜHRER; :
"GERMAN GOVERNMENT MUSEUMS, GALLERIES, :
STORAGE & RESTORATION FACILITIES" :
(fictitious names used until actual names discovered), :
"JOHN DOE PRIVATE MUSEUMS, GALLERIES, :
STORAGE & RESTORATION FACILITIES", :
(fictitious names used until actual names discovered), :
PHILIPS COLLECTION GALLERY / MUSUEM :
Defendants. :
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NOTICE OF MOTION TO EXTEND THE 120 DAYS WITHIN WHICH TO
COMPLETE RULE 4 (HAGUE CONVENTION) SERVICE OF PROCESS ON
DEFENDANT GOVERNMENTS, AGENCIES AND THEIR REPRESENTATIVES

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PLEASE TAKE NOTICE on July 29, 2005, that plaintiff ASSOCIATION OF HOLOCAUST VICTIMS FOR RESTITUTION OF ARTWORK and MASTERPIECES, a/k/a "AHVRAM" on behalf of itself, its members and other plaintiffs will move this Court, located at United States District Court, for the Southern District of New York, 40 Foley Square, Courtroon ___, New York, NY, by application to the Honorable Laura Taylor Swain USDJ, for an Order extending the time within which to serve the defendant Governmental institutions.

PLEASE TAKE FURTHER NOTICE that in making this application, Plaintiffs shall rely upon the accompanying Affidavit of Edward D. Fagan, which shows the good faith efforts which Plaintiffs have undertaken to complete service of process, using the Hague Convention service procedures as articulated in Fed. R. Civ. P. 4 *et seq.*, on the defendant foreign governments as well as their agencies and/or representatives who were involved in the causes of action set forth in the complaint.

PLEASE TAKE FURTHER NOTICE that opposition, if any, should be filed and served in accordance with the Local Rules.

Dated: July 5, 2005

/s/ _____
Edward D. Fagan, Esq.
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New York, NY 10005
Tel. (646) 502-5270
Plaintiff Pro-Se and Plaintiffs' Co-Counsel

/s/ _____
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Tel. (516) 564-6734
Plaintiffs' Co-Counsel